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REPORT FOR CONSULTATION ON THE BUFFALO AIR QUALITY CONTROL REGION

National Air Pollution Control Administration
Washington, D. C.

February 1969

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The basic background information is presented for the consultation with state and local authorities prior to the designation of air quality control regions as stipulated in the Clean Air Act. Boundaries for the regions are proposed and the factors which are the basis for the proposed boundaries are discussed. Reports for consultation consider these factors: geography; population and economic activity; their prospective growth; probable direction of physical growth; the emission inventory and the location of sources; air quality and pollution transport analysis; regional planning; air pollution control; and governmental jurisdictions.

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this document may be better
studied on microfiche

U.S. DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
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PREFACE

The Secretary, Department of Health, Education, and Welfare, is directed by the Air Quality Act of 1967 to designate "air quality control regions" to provide a basis for the establishment of air quality standards and the implementation of air quality control programs. In addition to listing the major factors to be considered in the development of region boundaries, the Act stipulates that the designation of a region shall be preceded by a consultation with appropriate State and local authorities.

The National Air Pollution Control Administration, DHEW, has conducted a study of the Metropolitan Buffalo Area, the results of which are presented in this report. The Region* boundaries proposed in this report reflect consideration of all available and pertinent data; however, the boundaries remain subject to revisions suggested during consultation with State and local authorities. Formal designation of a Region will follow the consultation meeting. This report is intended to serve as background material for the consultation.

The Administration appreciates assistance received either directly during the course of this study or indirectly during previous activities in the Buffalo Metropolitan Area from official air pollution control agencies at the State and local level, and the Erie and Niagara Counties Regional Planning Board.

*For the purposes of this report, the word region, when capitalized, will refer to the Buffalo Air Quality Control Region. When not capitalized, unless otherwise noted, it will refer to air quality control regions in general.

INTRODUCTION

> "For the purpose of establishing ambient air quality standards pursuant to section 108, and for administrative and other purposes, the Secretary, after consultation with appropriate State and local authorities shall, to the extent feasible, within 18 months after the date of enactment of the Air Quality Act of 1967 designate air quality control regions based on jurisdictional boundaries, urban-industrial concentrations, and other factors including atmospheric areas necessary to provide adequate implementation of air quality standards. The Secretary may from time to time thereafter, as he determines necessary to protect the public health and welfare and after consultation with appropriate State and local authorities, revise the designation of such regions and designate additional air quality control regions. The Secretary shall immediately notify the Governor or Governors of the affected State or States of such designation."
>
> Section 107(a)(2), Air Quality Act of 1967

THE AIR QUALITY ACT

Air Pollution in most of the Nation's urban areas is a regional problem. This regional problem demands a regional solution, consisting of coordinated planning, data gathering, standard setting, and enforcement. Yet, with few exceptions, such coordinated efforts are notably absent among the Nation's urban complexes.

Beginning with the Section quoted above, in which the Secretary is required to designate air quality control regions, the Air Quality Act presents an approach to air pollution control involving coordinated efforts by Federal, State, and local governments, as shown in Figure 1. After the Secretary has (1) designated regions, (2) published air quality criteria, and (3) published corresponding documents on control technology and associated costs, the Governor(s) of the State(s) must file with the Secretary within 90 days a letter of intent, indicating that the State(s) will adopt within 180 days ambient air quality standards for the pollutants

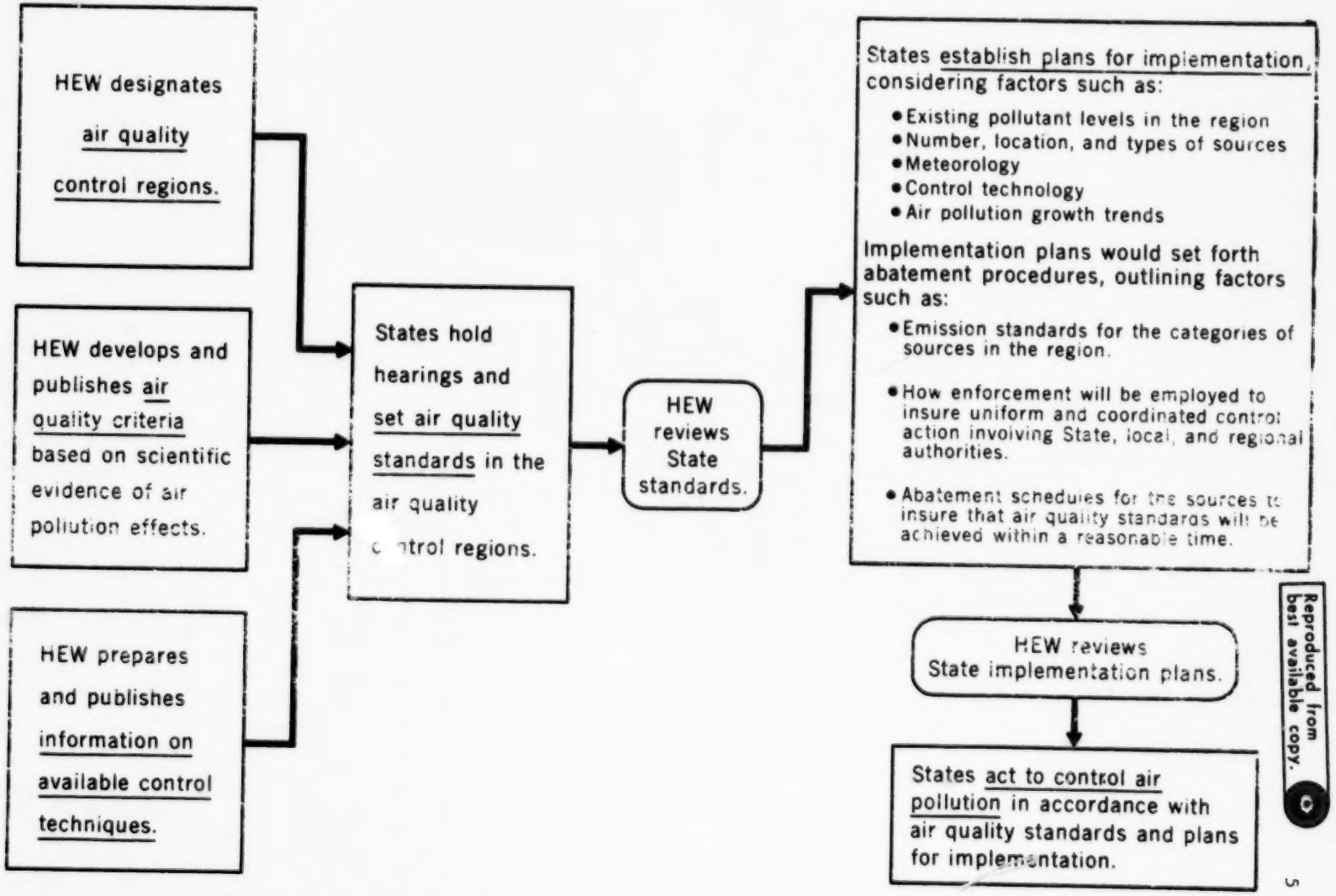

HEW designates air quality control regions.
HEW develops and publishes air quality criteria based on scientific evidence of air pollution effects.
HEW prepares and publishes information on available control techniques.
States hold hearings and set air quality standards in the air quality control regions.
HEW reviews State standards.
States establish plans for implementation, considering factors such as:
• Existing pollutant levels in the region
• Number, location, and types of sources
• Meteorology
• Control technology
• Air pollution growth trends
Implementation plans would set forth abatement procedures, outlining factors such as:
• Emission standards for the categories of sources in the region.
• How enforcement will be employed to insure uniform and coordinated control action involving State, local, and regional authorities.
• Abatement schedules for the sources to insure that air quality standards will be achieved within a reasonable time.
HEW reviews State implementation plans.
States act to control air pollution in accordance with air quality standards and plans for implementation.

Figure 1 Flow diagram for State action to control air pollution on a regional basis.

Reproduced from best available copy.

covered by the published criteria and control technology documents and adopt within an additional 180 days plans for the implementation, maintenance, and enforcement of those standards in the designated air quality control regions.

The new Federal legislation provides for a regional attack on air pollution and, at the same time, allows latitude in the form which regional efforts may take. While the Secretary retains approval authority, the State(s) involved in a designated region assumes the responsibility for developing standards and an implementation plan which includes administrative procedures for abatement and control. Informal cooperative arrangements with proper safeguards may be adequate in some regions, whereas in others, more formal arrangements, such as interstate compacts, may be selected. The objective in each instance will be to provide effective mechanisms for control on a regional basis.

THE SIZE OF A REGION

Several objectives are important in determining how large an air quality control region should be. Basically, these objectives can be divided into three separate categories. First a region should be self-contained with respect to air pollution sources and receptors. In other words, a region should include most of the important sources in the area as well as most of the people and property affected by those sources. In this way, all the major elements of the regional problem will lie within one unified administrative jurisdiction. Unfortunately, since air pollutants can travel long distances, it is impractical if not impossible to delineate regions which are completely self-contained. The air over a region will

usually have at least trace amounts of pollutants from external sources. During episodic conditions, such contributions from external sources may even reach significant levels. Conversely, air pollution generated within a region and transported out of it can affect external receptors to some degree. It would be impractical and inefficient to make all air quality control regions large enough to encompass these low-level trace effects. The geographic extent of trace effects overestimates the true problem area which should be the focus of air pollution control efforts. Thus, the first objective, that a region be self-contained, becomes a question of relative magnitude and frequency. The dividing line between "important influence" and "trace effect" will be a matter of judgment. The judgment should be based on estimates of the impact a source has upon a region, and the level of pollution to which receptors are subjected. In this respect, annual and seasonal data on pollutant emissions and ambient air concentrations are a better measure of relative influence than short term data on episodic conditions.

The second general objective requires that region boundaries be designed to meet not only present conditions but also future conditions. In other words, the region should include areas where industrial and residential expansion are likely to create air pollution problems in the foreseeable future. This objective requires careful consideration of existing metropolitan development plans, expected population growth, and projected industrial expansion. Such considerations should result in the designation of regions which will contain the sources and receptors of regional air pollution for a number of years to come. Of course, region boundaries need not be permanently fixed, once designated. Boundaries

should be reviewed periodically and altered when changing conditions warrent readjustment.

The third objective is that region boundaries should be compatible with and even foster unified and cooperative governmental administration of the air resource throughout the region. Air pollution is a regional problem which often extends across several municipal, county, and even state boundaries. Clearly, the collaboration of several governmental jurisdictions is prerequisite to the solution of the problem. Therefore, the region should be delineated in a way which encourages regional cooperation among the various governmental bodies involved in air pollution control. In this regard, the existing pattern of governmental cooperation on the whole range of urban problems may become an important consideration. Certainly the pattern of cooperation among existing air pollution control programs is a relevant factor. In general, administrative considerations dictate that governmental jurisdictions should not be divided. Although it would be impractical to preserve State jurisdictions undivided, usually it is possible to preserve the unity of county governments by including or excluding them in their entirety. Occasionally, even this would be impractical due to a county's large size, wide variation in level of development, or striking topographical features.

To the extent that any two of the above three objectives lead to incompatible conclusions concerning region boundaries, the region must represent a reasonable compromise. A region should represent the best way of satisfying the three objectives simultaneously.

PROCEDURE FOR DESIGNATION OF REGIONS

Figure 2 illustrates the procedures used by the National Air Pollution Control Administration for designating air quality control regions.

A preliminary delineation of the region is developed by bringing together two essentially separate studies--the "Evaluation of Engineering Factors," and the "Evaluation of Urban Factors."

The study of "Engineering Factors" indicates the location of pollution sources and the geographic extent of serious pollutant concentrations in the ambient air. Pollution sources are located by taking an inventory of emissions from automobiles, industrial activities, space heating, waste disposal, and other pollution generators. Pollution concentrations in the ambient air are estimated from both air quality sampling data and a theoretical diffusion model. When it exists, air quality sampling data is more reliable than the theoretical diffusion model results since the data is directly recorded by pollution measuring instruments. Unfortunately, in many cases air quality sampling data is available for only one or two pollutants measured at an insufficient number of locations. The theoretical model is used to supplement inadequate air quality sampling data. As a whole, the engineering study indicates how large the air quality control region must be in order to encompass most pollution sources and most people and property affected by those sources.

The study of "Urban Factors" encompasses non-engineering considerations. It reviews existing governmental jurisdictions, current air pollution control programs, present concentrations of population and industry,

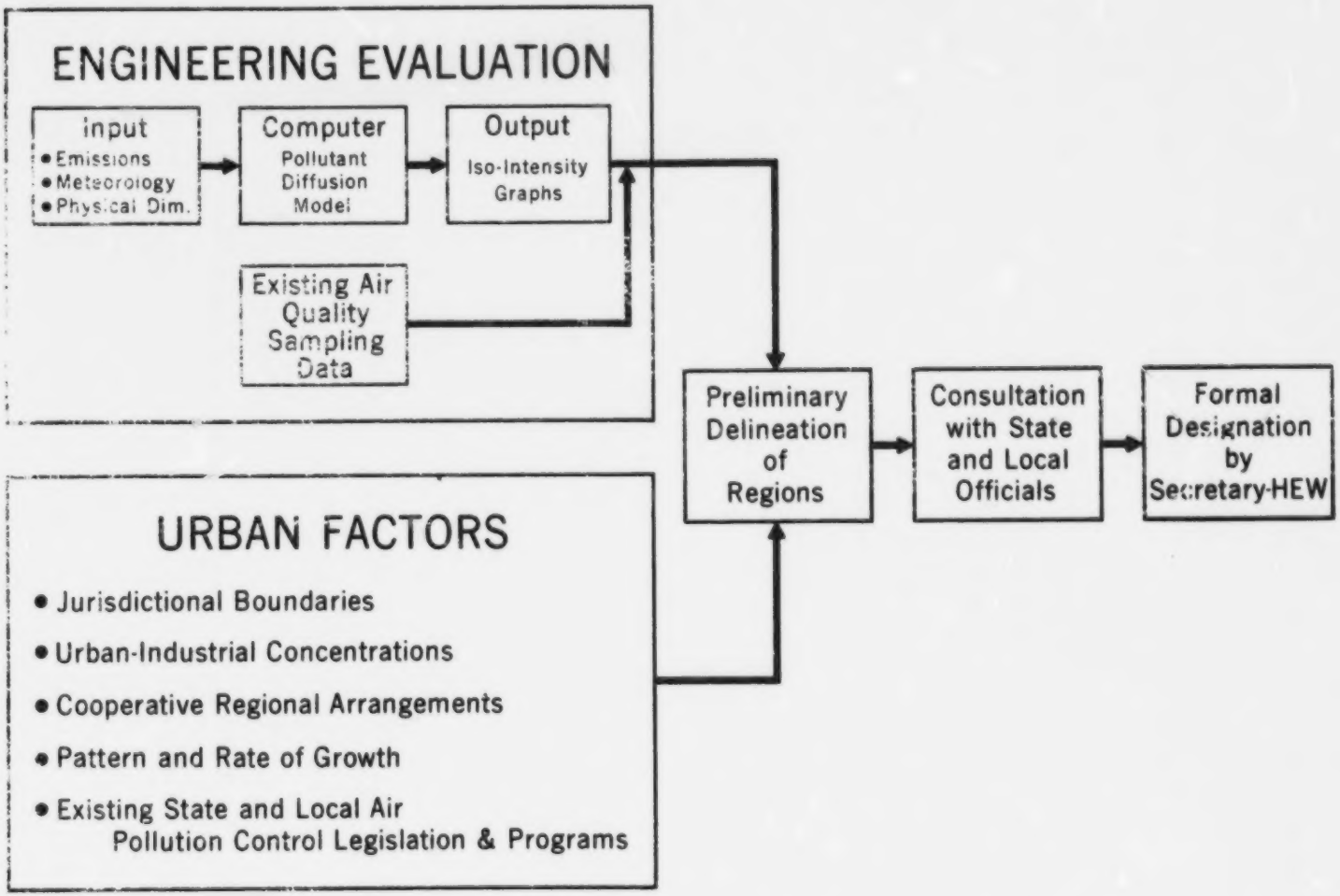


Figure 2. Flow diagram for the designation of air quality control regions.

and expected patterns of urban growth. Other non-engineering factors are discussed when they are relevant. As a whole, the study of urban factors indicates how large an air quality control region must be in order to encompass expected growth of the pollution problem in the future. It also considers which group of governmental jurisdictions will most effectively administer a strong regional air quality control program.

The conclusions of the engineering study are combined with the results of the urban factors study to form the basis of an initial proposal for an air quality control region. As shown in figure 2, the proposal is then submitted for consultation with State and local officials. After reviewing the suggestions raised during the consultation, the Secretary formally designates the region with a notice in the Federal Register and notifies the governors of the States affected by the designation.

The body of this report contains a proposal for the boundaries of the Buffalo Air Quality Control Region and supporting studies on engineering and urban factors. The report itself is intended to serve as the background document for the formal consultation with appropriate State and local authorities.

EVALUATION OF URBAN FACTORS

INTRODUCTION

A number of urban factors are relevant to the problem of defining air quality control region boundaries. First, the location of population is an important consideration, since human activity is the ultimate cause of air pollution, and humans are the ultimate victims. The population growth pattern is another important consideration, since an air quality control region should be designed not only for the present but also for the future. The location of industrial activity and the industrial growth pattern are relevant considerations for similar reasons. Political and jurisdictional considerations are important, since the 1967 Air Quality Act envisions regional air pollution programs based on cooperative efforts among many political jurisdictions. The following discussion of urban factors will present these considerations as they apply to the Buffalo area.

Population

Figure 3 displays present population densities in the metropolitan Buffalo area. Approximately 1,700,000 people reside in the seven-county area surrounding the City of Buffalo (Niagara, Erie, Orleans, Genesee, Wyoming, Chautauqua, and Cattaraugus Counties). About two thirds of these people reside within the County of Erie alone. A large part of the remainder lives in Niagara County. Thus, among the seven counties considered, these two have by far the heaviest population densities.

Figure 4 displays expected population growth during the next twelve

Figure 3:
POPULATION DENSITY, (1968)

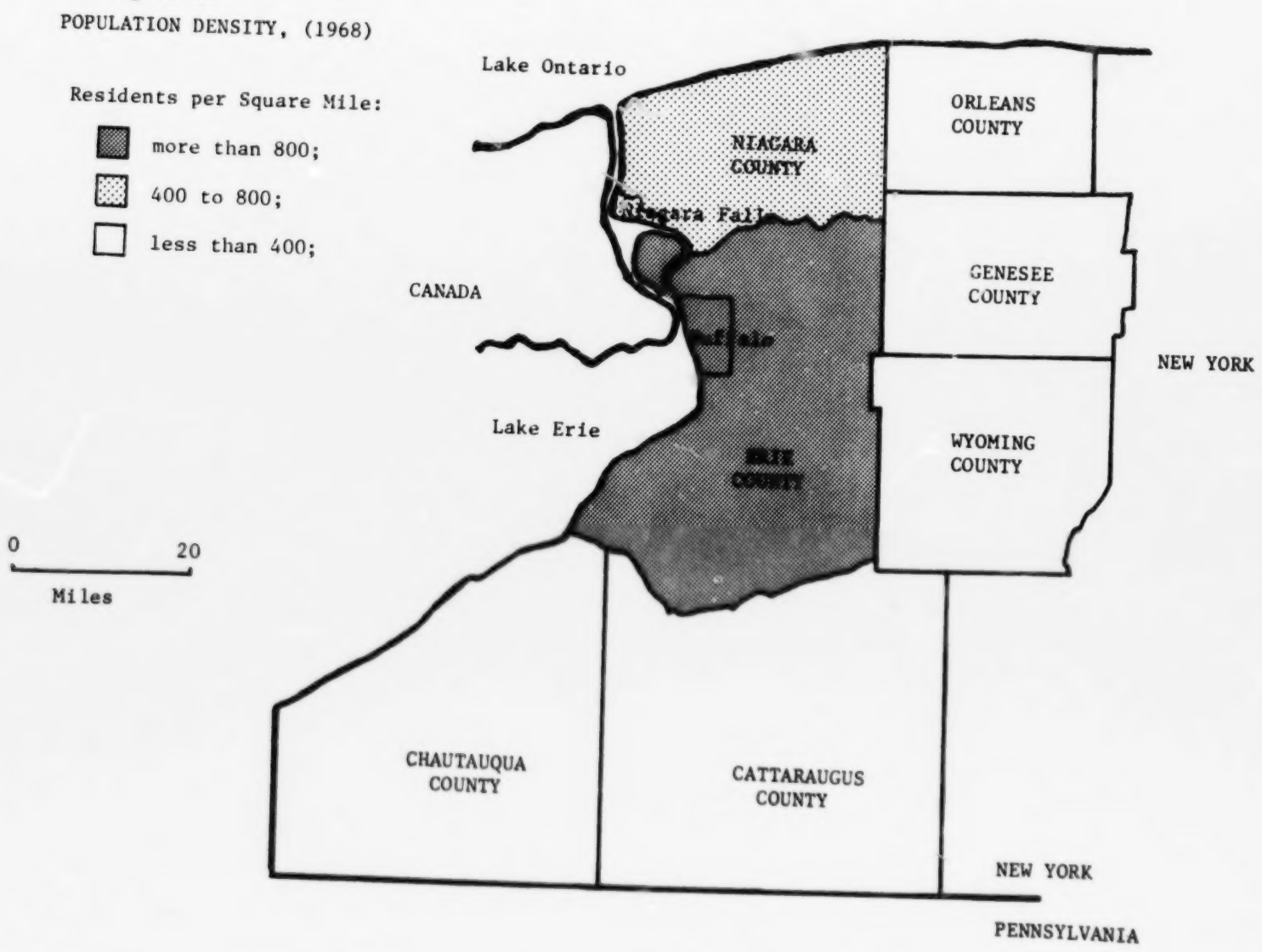
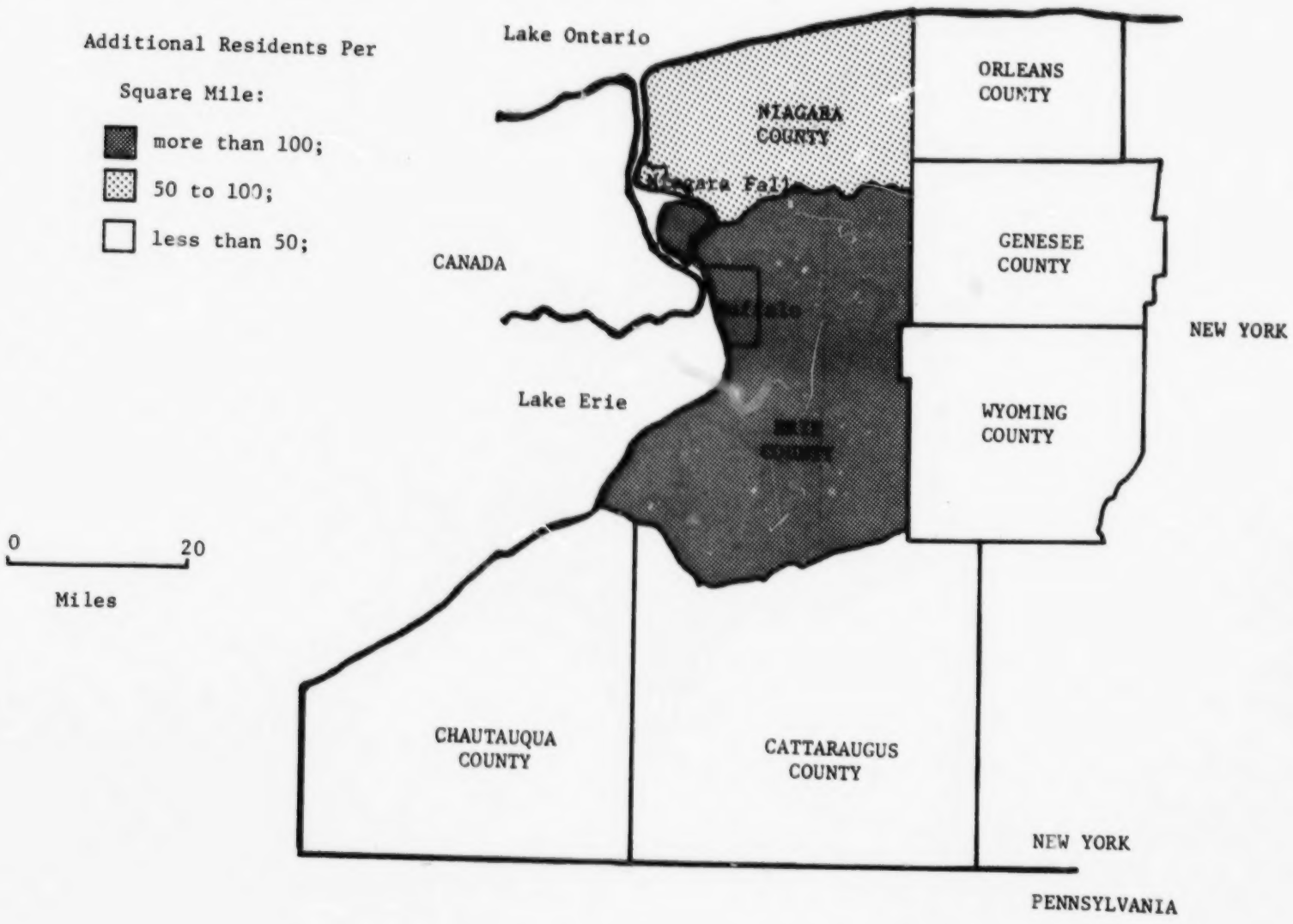


Figure 4:

POPULATION GROWTH, 1968 to 1980



years in the Buffalo area. From 1968 to 1980, Erie County is expected to grow by 110 additional residents per square mile, and Niagara County by 53. In contrast, the other counties in the area are expected to have 24 or fewer additional residents per square mile. Thus, population is concentrated in Erie and Niagara Counties not only for the present, but also for the foreseeable future.

Industry

One method for determining the location of manufacturing activity is based on the density of people employed in manufacturing firms, as shown in Figure 5. During 1963, Erie and Niagara had 118 and 73 employees in manufacturing firms per square mile. Adjacent counties had 18 or fewer. Clearly, industrial activity in the Buffalo area is concentrated in Erie and Niagara.

Existing Air Pollution Control Programs

The air pollution control program of the State of New York has an annual budget of approximately $3,500,000. The state statutes authorize local air pollution control programs to exercise joint jurisdiction at the local level. The air pollution control program of Erie County has an annual budget of about 340,000 dollars and Niagara County about 80,000 dollars. None of the other counties in the area has a program of comparable size. The Erie and Niagara programs have not established any joint activities such as joint air quality measurement, joint technical facilities, or joint enforcement of air pollution regulations. However, the two programs do maintain informal contact. Furthermore, the programs maintain informal

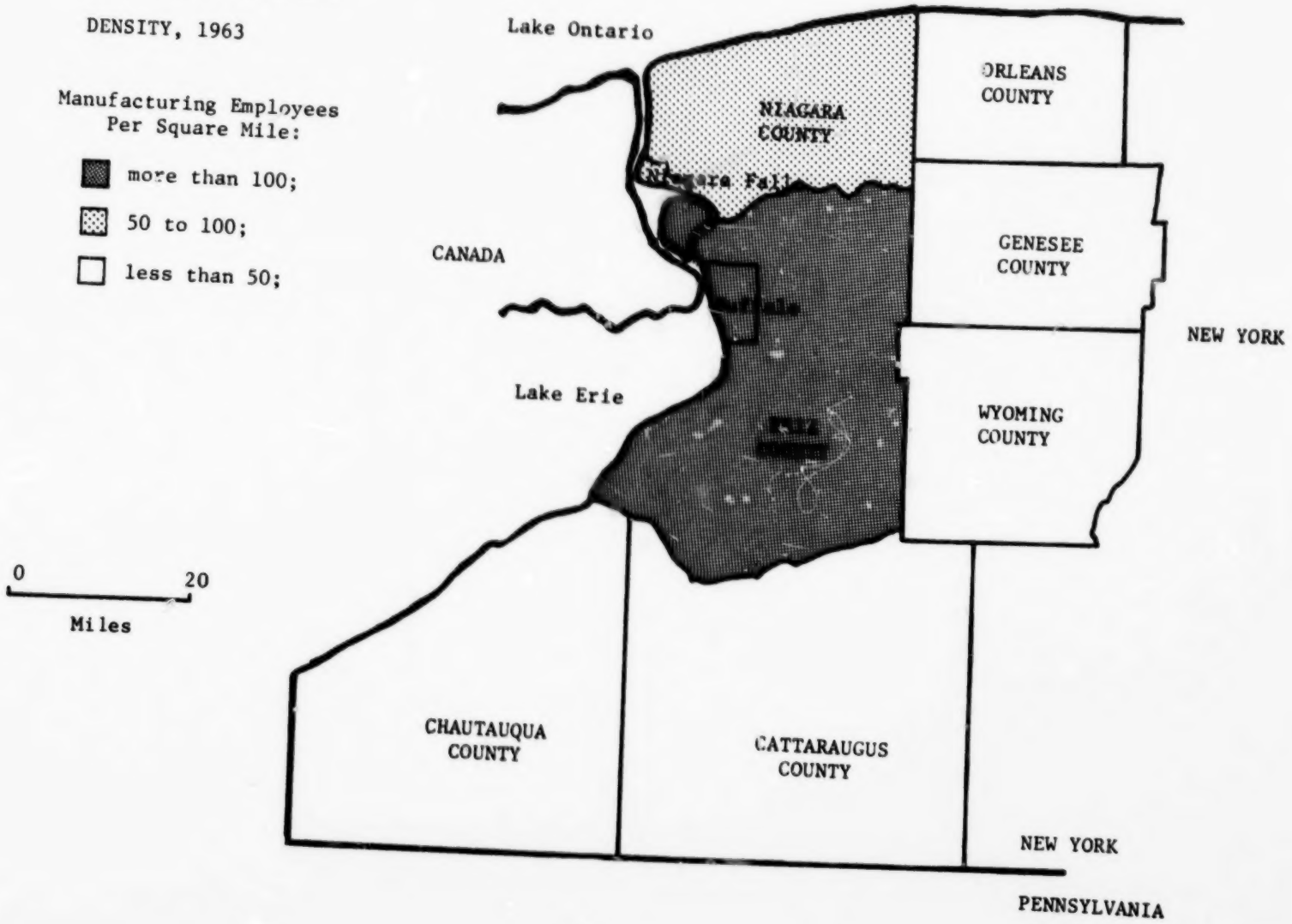
Figure 5:

MANUFACTURING EMPLOYMENT

DENSITY, 1963

Manufacturing Employees
Per Square Mile:

- more than 100;
- 50 to 100;
- less than 50;



contact with their counterpart in Canada, the air pollution control program of Ontario.

Regional Planning in the Buffalo Area

The Erie and Niagara Counties Regional Planning Board conducts regional planning functions for the two-county area. It has a budget of about 400,000 dollars, including operating expenses and grants, and produces plans related to land use, transportation, and other urban services.

SUMMARY

The evaluation of urban factors indicates that an air quality control region composed of Erie and Niagara Counties would satisfy the objectives outlined above for region boundaries. Population, industry, and current air pollution control efforts are centered in Erie and Niagara Counties. Surrounding counties are not closely linked to the Buffalo area in terms of population, employment, or planning activities. Growth in the Buffalo area during the next decade is unlikely to extend beyond Erie and Niagara Counties.

EVALUATION OF ENGINEERING FACTORS

INTRODUCTION

The engineering evaluation for the Buffalo area was based on a study of topography, pollutant emissions, estimated air quality levels and available ambient air quality data. The emission inventory indicated the location of point and area sources, the quantity of pollutants emitted from these sources, and the resulting emission densities. This information was combined with meteorological data and used in a diffusion model to estimate air quality levels in the Buffalo area. The estimated air quality information was supplemented by measured air quality data whenever available.

TOPOGRAPHY

The City of Buffalo is located on the Huron Plain, about 600 feet above sea level. This plain forms an east-west band of land along the southern shoreline of Lake Ontario. To the south of this plain the land rises as much as 1,000 feet more to the upland areas of the Erie Plain and the foothills of the Allegheny Plateau.

METEOROLOGY

Lake Eries exerts a noticeable influence on the local meteorology and climate of Buffalo. Winds from the southwest direction, which traverse a long unobstructed path over the Lake before reaching Buffalo, are generally stronger than winds from other directions. The Lake tends to act as a moderating influence on temperature changes in the air mass above

it. Especially during summer a land-sea breeze circulation of local air occurs. Precipitation is also influenced by Lake Erie. Air traversing the Lake acquires moisture which is then released on Buffalo due to orographic lifting.

The Buffalo wind rose is shown in Figure 6. It reveals the predominence of southwesterly winds in the Buffalo area. In general, air pollution is transported towards the northeast from emission sources in the urbanized areas of Niagara Falls and Buffalo.

EMISSION INVENTORY

The National Air Pollution Control Administration conducted an inventory of air pollutant emissions for the Buffalo area. Three major pollutants--sulfur oxides, carbon monoxide, and particulates--were considered since they provide a general measure of the extent of the air pollution problem around Buffalo.

The Buffalo emissions inventory encompasses the counties of Erie and Niagara. This area was divided into the grid coordinate system shown in Figure 7. The estimated emissions of each of the three pollutants by grid zone were expressed as average daily emissions for three different time periods--annual, winter, and summer. Table 1 shows the annual-average daily emissions.

Annual-average emission densities for each of the three pollutants in tons per square mile per day were determined by relating the total quantity of pollutants emitted in each of the grid zones to the land area of each zone. Figures 8, 9, and 10 show the resulting densities on maps.

Figure 6: BUFFALO WIND ROSE

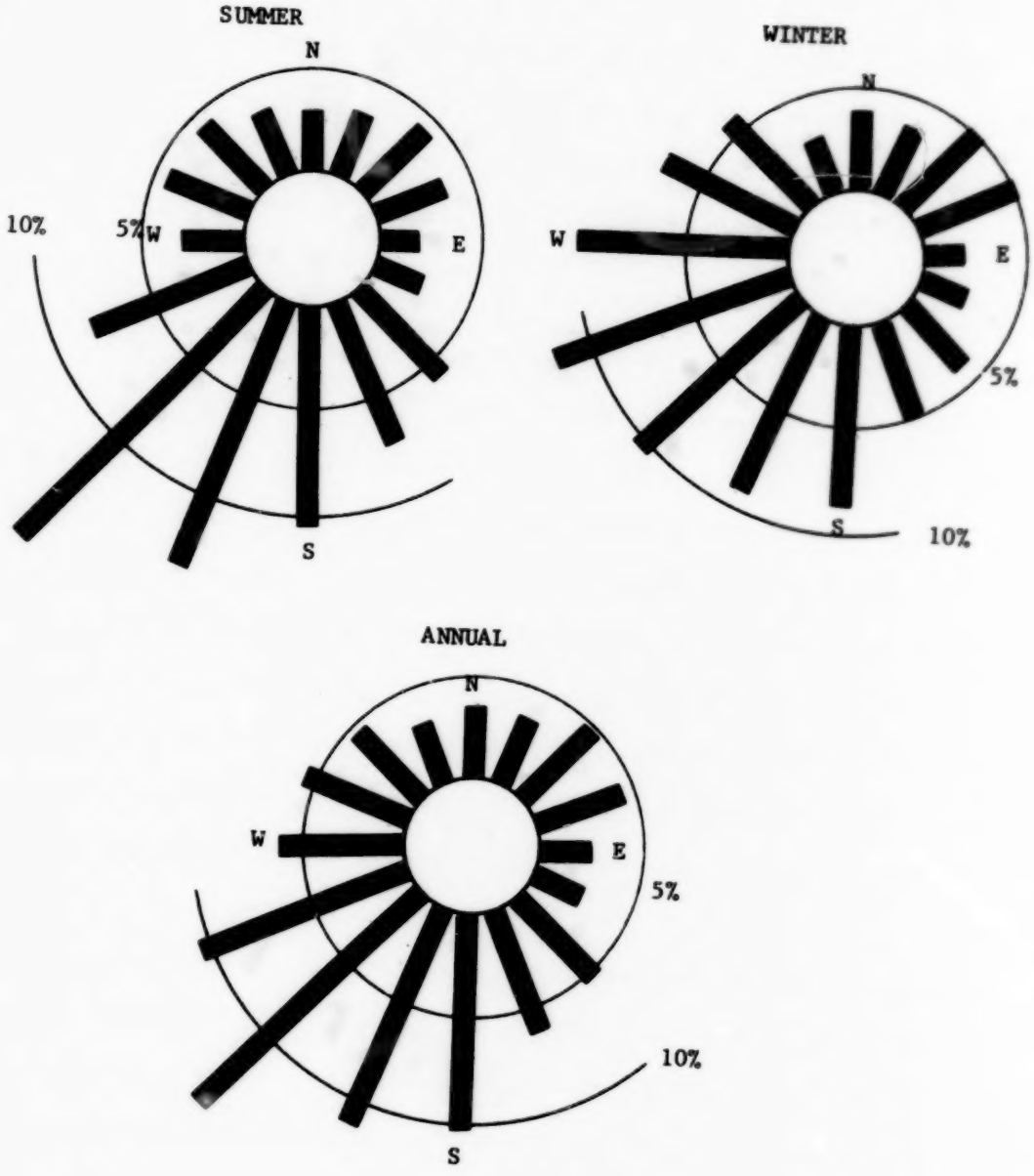


Figure 7: BUFFALO GRID SYSTEM

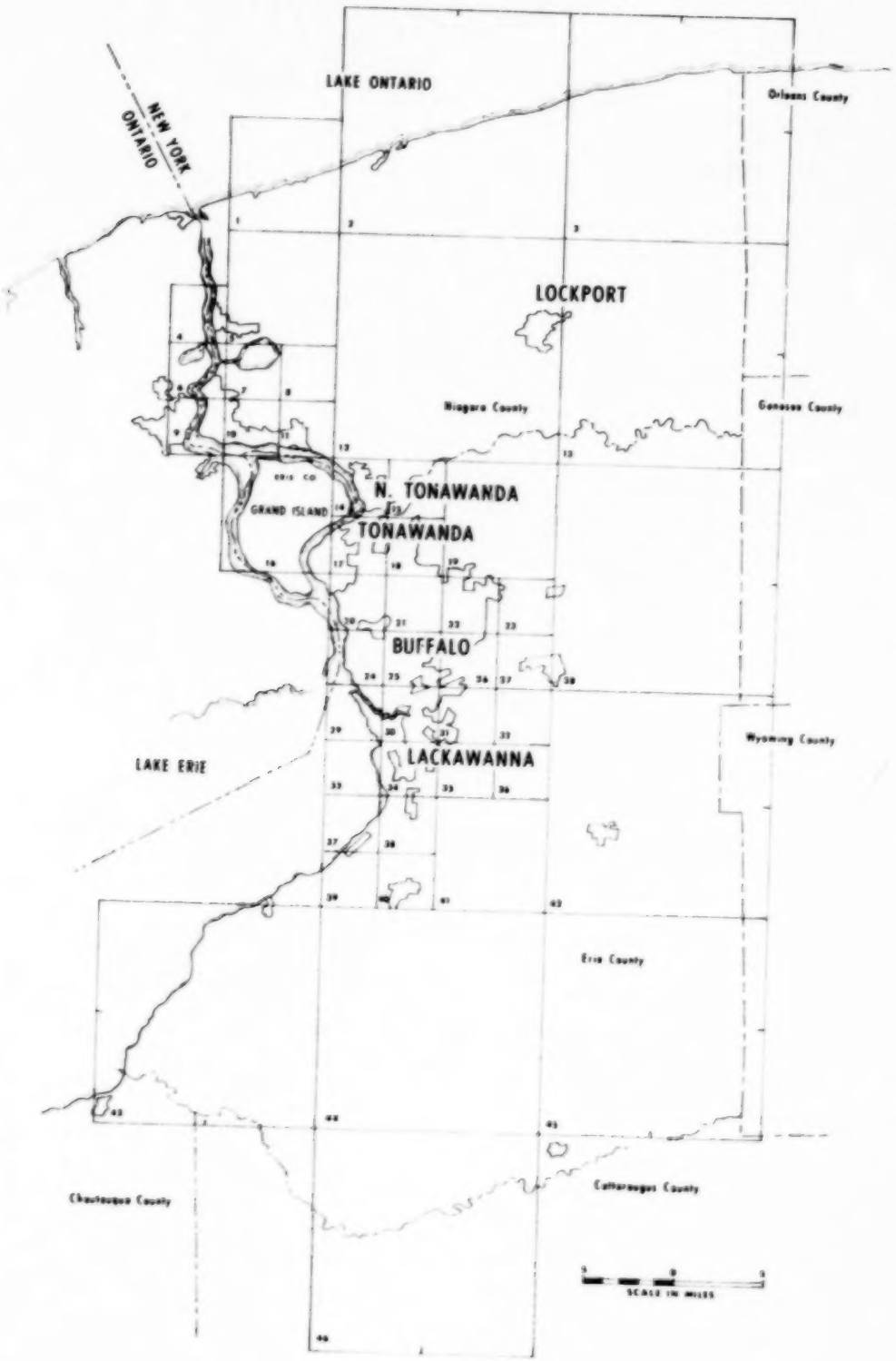


Table 1:
Emissions by Grid for the Buffalo Study Area
(tons per day)

Grid	Area of Grid (Square Miles)	Sulfur Oxides	Particulates	Carbon Monoxide
1	15	.21	.25	5.0
2	69	.27	.25	18.
3	81	.24	.30	14.
4	2	.10	.04	.82
5	38	.38	.30	13.
6	3	7.5*	30.*	19.*
7	7	2.5*	7.4*	12.
8	10	.17	.23	24.
9	3	4.0	.50	7.2
10	8	93.*	22.*	25.
11	8	.53	.37	31.
12	155	20.*	4.2*	45.
13	131	1.0	.60	23.
14	10	16.*	10.*	8.1
15	10	1.7	.34	14.
16	31	79.*	23.*	45.
17	10	37.	15.	33.
18	10	12.	5.1	41.
19	38	.70	.56	4.8
20	10	300.*	46.	70.
21	10	1.3	1.2	60.
22	10	12.	5.4	38.
23	10	12.	5.2	11.
24	6	17.	7.6	66.
25	10	26.	13.	78.
26	10	37.	15.	41.
27	10	24.	9.5	14.
28	131	13.	5.4	43.
29	3	27.	14.	16.
30**	10		Disclosure	
31	10	36.	14.	36.
32	10	.25	.19	11.
33			n o d a t a	
34**	10		Disclosure	
35	10	12.	5.0	29.

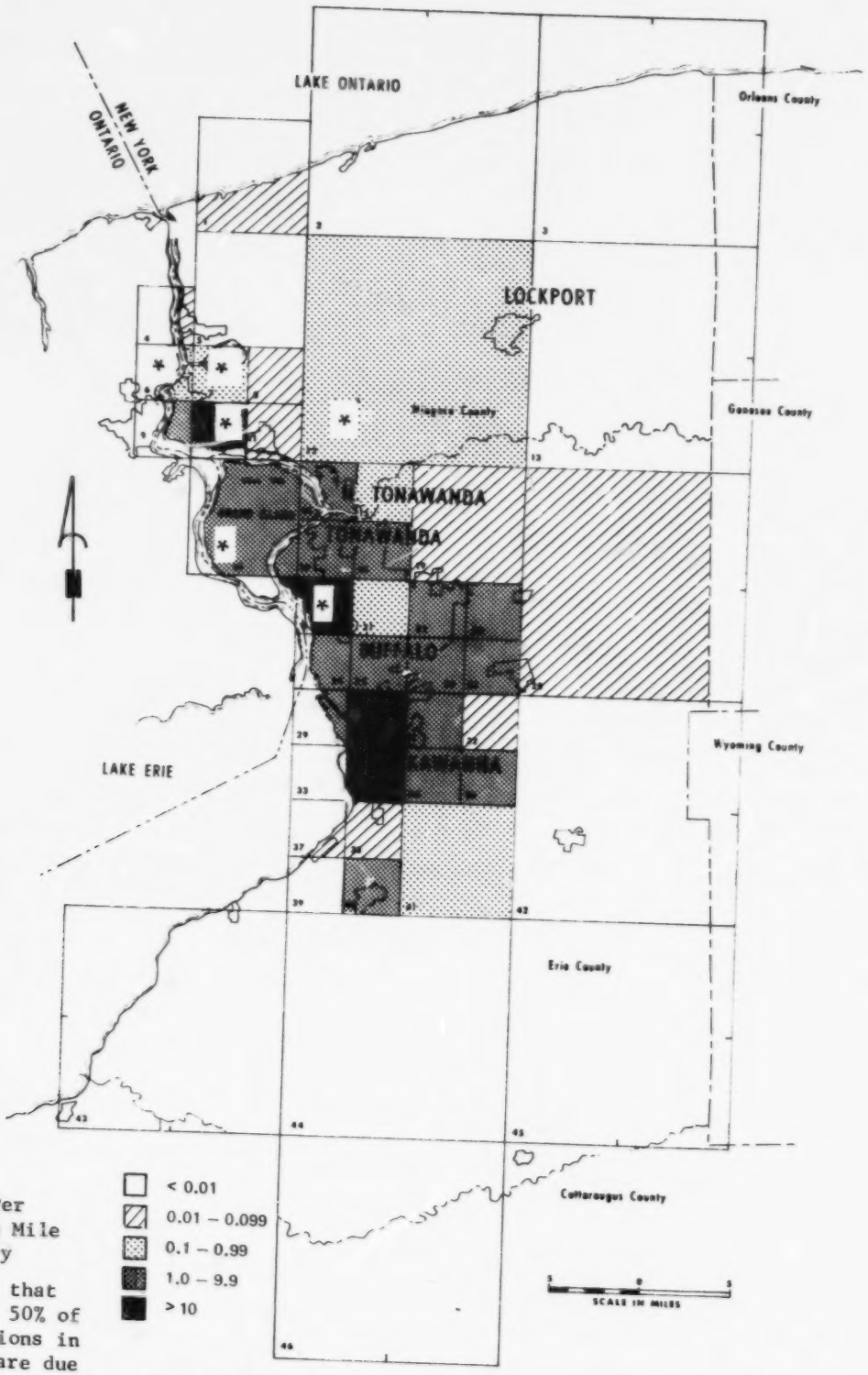
Emissions by Grid for the Buffalo Study Area (tons/day) (con't)

Grid	Area of Grid (Square Miles)	Sulfur Oxides	Particulates	Carbon Monoxide
36	10	24.	9.3	8.1
37	2	.02	.06	1.5
38	10	.34	.34	21.
39	10	.08	.15	7.9
40	10	12.	4.7	6.5
41	38	24.	9.6	34.
42	131	.57	.49	34.
43	108	.39	.81	34.
44	155	.35	.56	31.
45	139	.40	.54	20.
46	54	.28	.26	7.9
30 & 34		300.	120.	130.
Total		1200. ***	410. ***	1200. ***

*Indicates that more than 50% of the emissions in the grid were due to point sources.

**Data for grids 30 and 34 were combined to prevent disclosure of the emissions from a single source.

***Note that all numbers have been rounded off to two significant figures.



* Indicates that more than 50% of the emissions in the grid are due to point sources.

Figure 8: Sulfur oxides emission density for average day

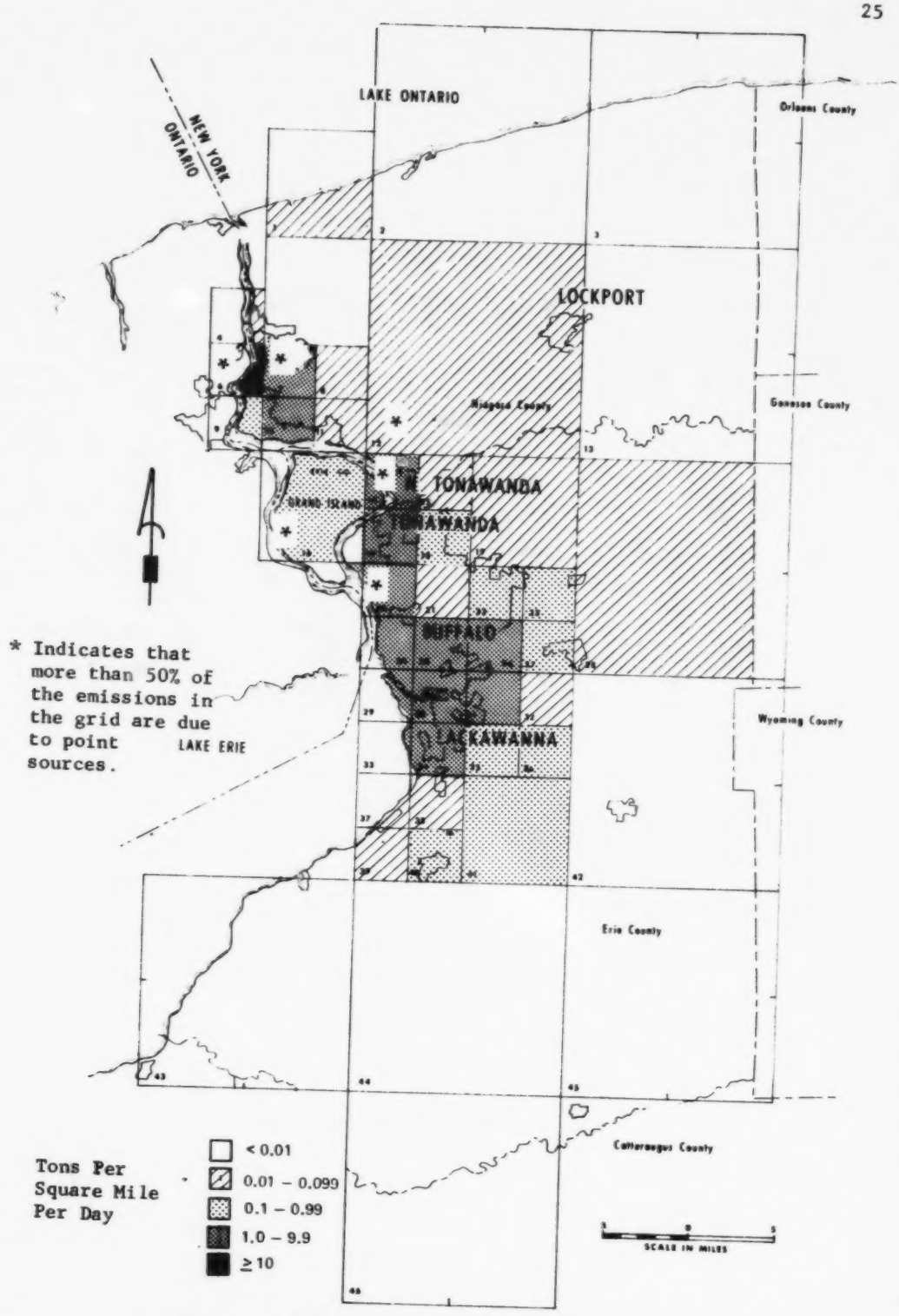


Figure 9: Particulate emission density for average day

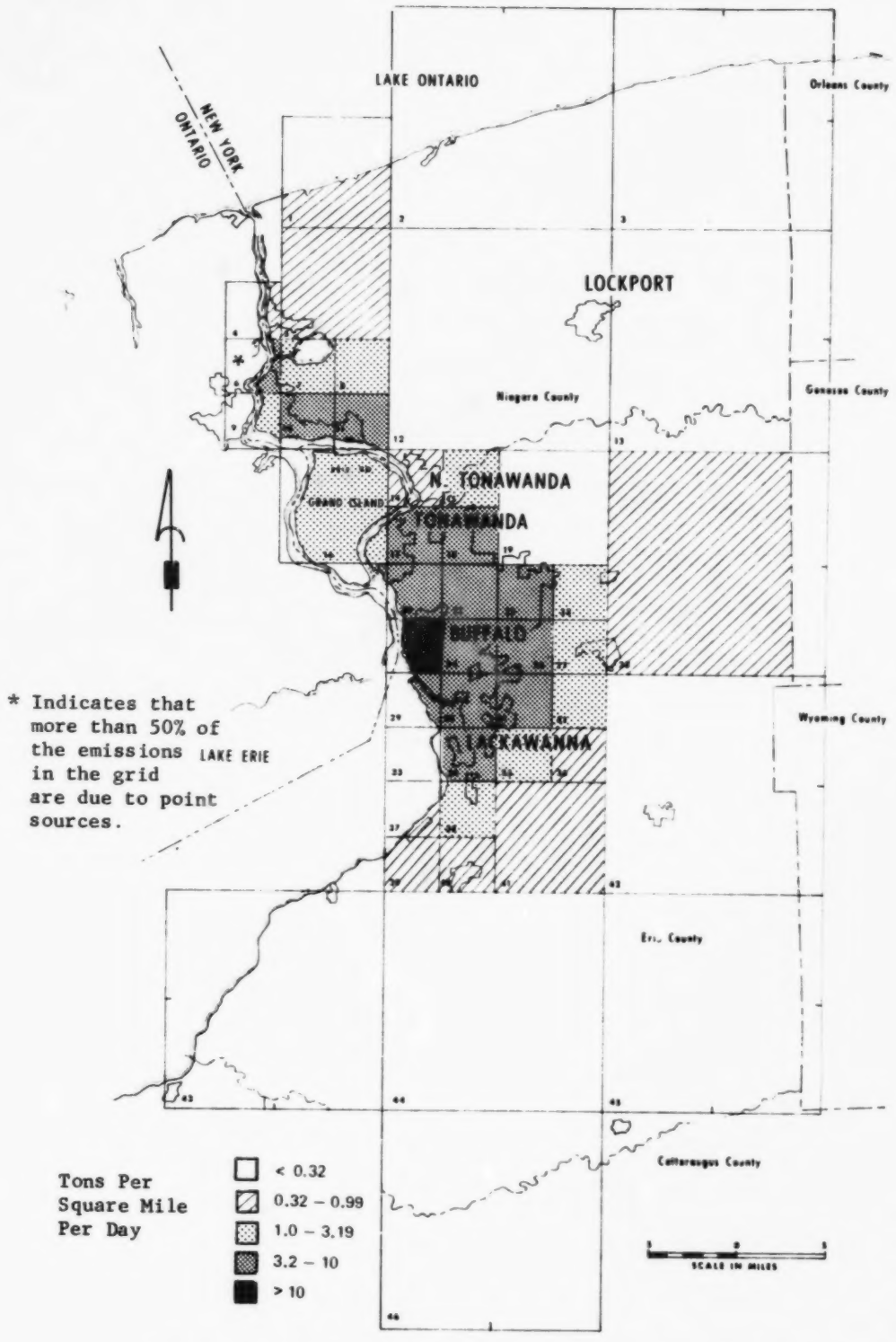


Figure 10: Carbon monoxide emission density for average day.

Where point sources are responsible for more than 50% of the emissions in a grid zone, this fact is indicated in both Table 1 and the figures. The 20 largest point sources alone are responsible for about 55% of sulfur oxide emissions, 45% of particulate emissions, and 5% of carbon monoxide emissions.

In general, all of the emission density maps show high emission rates in the cities of Niagara Falls (N.Y.) and Buffalo. The densities are moderate in the suburban areas south of Buffalo and are low in the rural portions of both Erie and Niagara Counties. Since the scope of this report does not encompass Canadian pollution sources, they do not appear in the emissions inventory.

About 90% of the sulfur oxides emissions are caused by the combustion of fuels, especially coal, coke, and residual oil. In turn, nearly all of the combustion of coal, coke, and residual oil is accountable to industrial energy requirements*. Thus, the sulfur oxides emission map reflects the location of industrial activity in the Buffalo area.

About 90% of the particulate emissions are caused by industrial process emissions and industrial fuel consumption. Therefore, the particulate emissions map also reflects the location of industrial activity.

More than 90% of the carbon monoxide emissions are caused by automotive transportation. The map reveals the impact of the New York Thruway and the concentration of traffic in the downtown areas of Buffalo and Niagara Falls.

*Steam-electric power generation by utilities consumes about 10% of the coal required for the area.

AIR QUALITY ANALYSIS

A study of air quality levels known or estimated to occur is useful in determining the area affected by the pollution sources and thus subject to inclusion in the air quality control region. Such analysis can be based directly on air quality sampling data in those instances where the sampling program covers a large enough area and has been in existence long enough to provide reliable patterns of air quality throughout the region under study. Measured air quality data can be supplemented by estimated air quality data, derived from a theoretical diffusion model using information on the location and quantity of pollutant emissions and on meteorological conditions.

Measured Air Quality Data

Measured air quality data for the Buffalo area is available from more than 30 locations. Suspended particulates, and sulfur oxides were measured at most of the stations. Figures 11 and 13 show the data. Since most of the stations were located in the urban centers, they did not indicate clearly how far out into the rural areas the air pollution extends. Only 8 stations were located in non-urban areas. However, data from these few stations indicate that the air pollutant concentrations decrease quickly in rural areas, especially to the south of Buffalo.

Estimated Air Quality

The diffusion model was applied for carbon monoxide, sulfur oxides, and particulates for three different time periods--summer, winter, and annual. For each pollutant, the time period which yielded the most

extensive air pollution problem is the appropriate period to consider. Carbon monoxide and particulate air pollution are most widespread in the summer period, whereas sulfur oxides pollution is most widespread in the winter period. The theoretical results for these three combinations of pollutant and time period are shown in the figures 12, 14, and 15.

Sulfur Oxides

The theoretical results for sulfur oxides pollution during the winter period (figure 12) are slightly higher than the measured results for an annual average (figure 11). Both results indicate that sulfur oxides concentrations in the urbanized areas are substantially above those of surrounding rural areas. Sulfur oxides pollution appears to extend to portions of Erie and Niagara Counties and Canada.

Particulates

The theoretical results for suspended particulates pollution during the summer period (figure 14) are lower than the measured results for an annual average (figure 13) by a factor of approximately 2. Since only eight measuring stations were located outside of the urbanized area, comparison of the two results for outlying areas is tenuous. However, both results indicate that the urbanized areas are subjected to suspended particulate concentrations which are substantially above those of surrounding rural areas. Suspended particulate pollution appears to encompass large portions of Erie and Niagara Counties and a small area in Canada.

Carbon Monoxide

The theoretical results for carbon monoxide concentrations during the summer period (figure 15) indicate that portions of Erie and Niagara

Figure 11:

MEASURED SULFUR OXIDES

CONCENTRATIONS , Annual Average

Parts Per Million :

- more than 0.050;
- 0.020 to 0.050;
- less than 0.020;

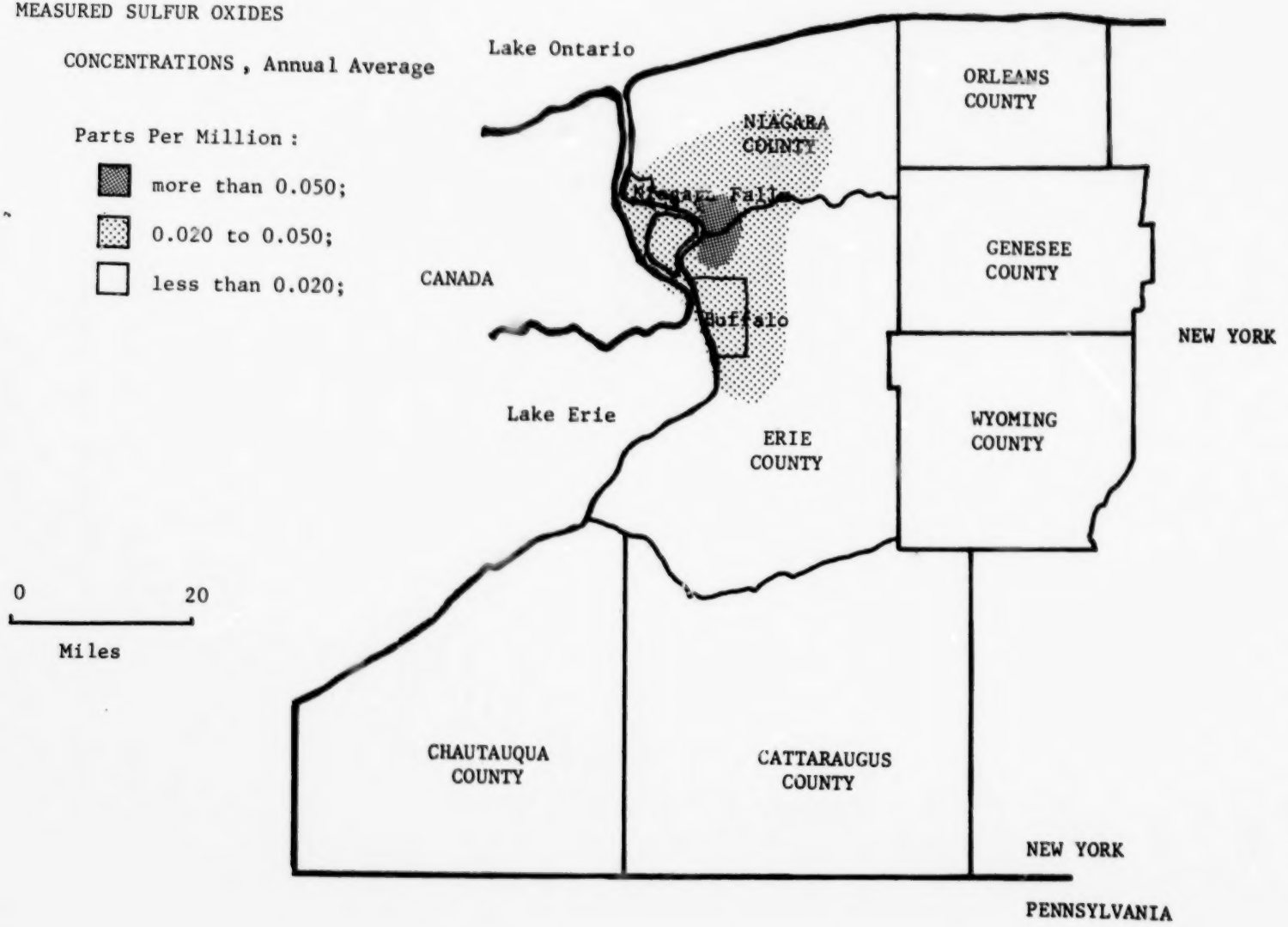


Figure 12:

THEORETICAL SULFUR OXIDES

CONCENTRATIONS, Winter Average

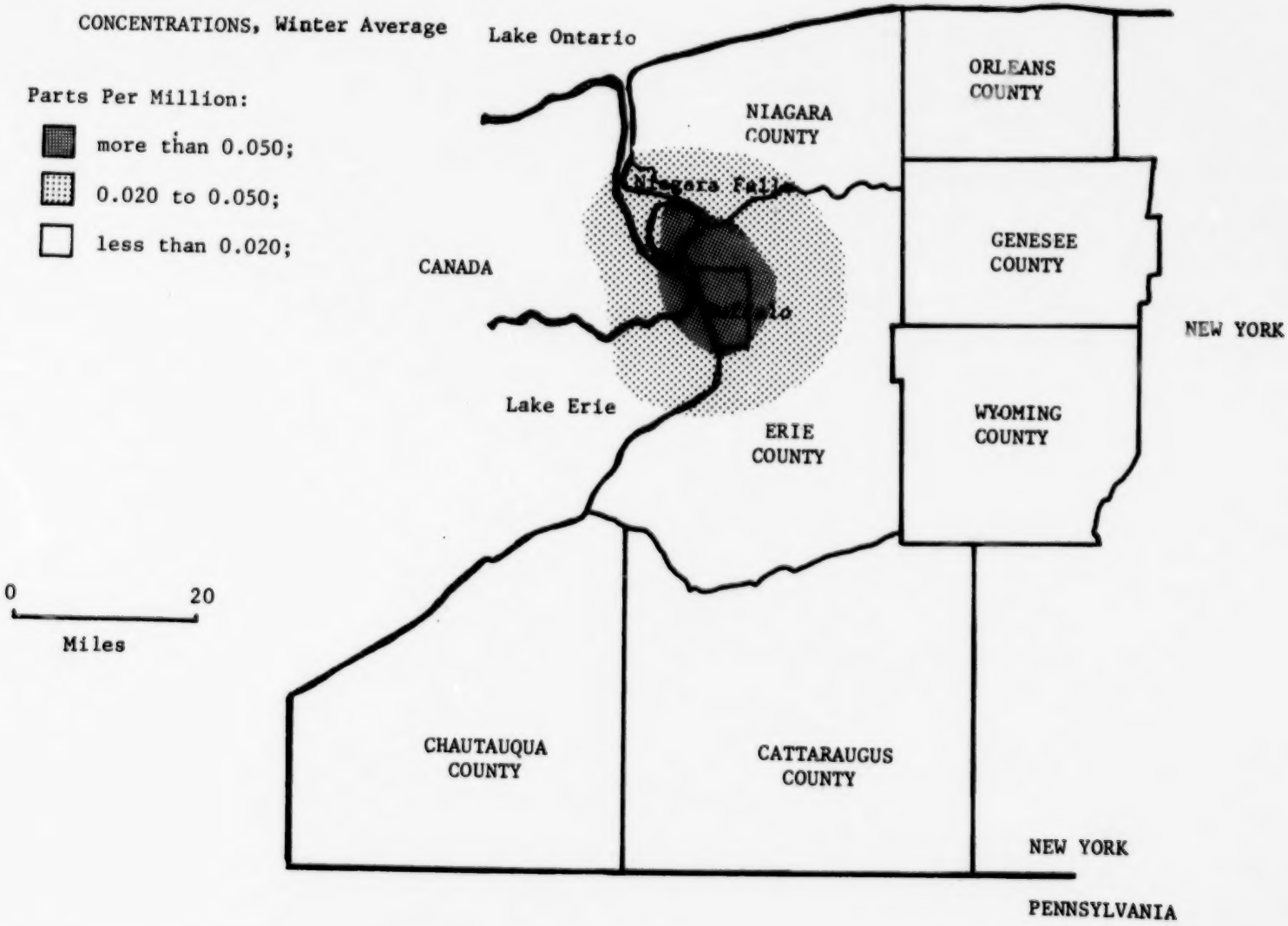


Figure 13:

MEASURED SUSPENDED PARTICULATES

CONCENTRATIONS

Annual Average

Micrograms Per Cubic Meter:

- more than 200;
- 100 to 200;
- 50 to 100;
- less than 50;

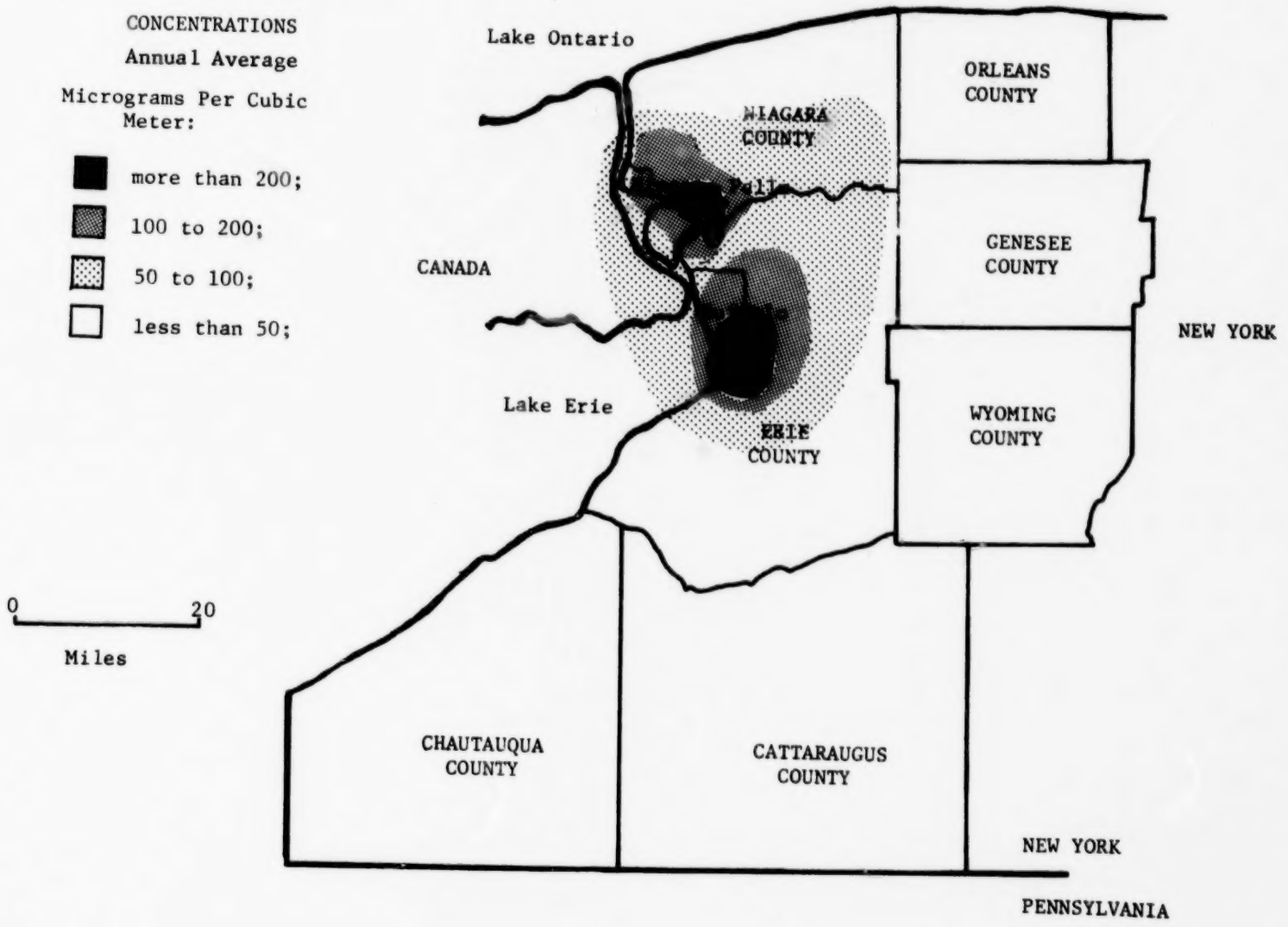


Figure 14:

THEORETICAL SUSPENDED PARTICULATES

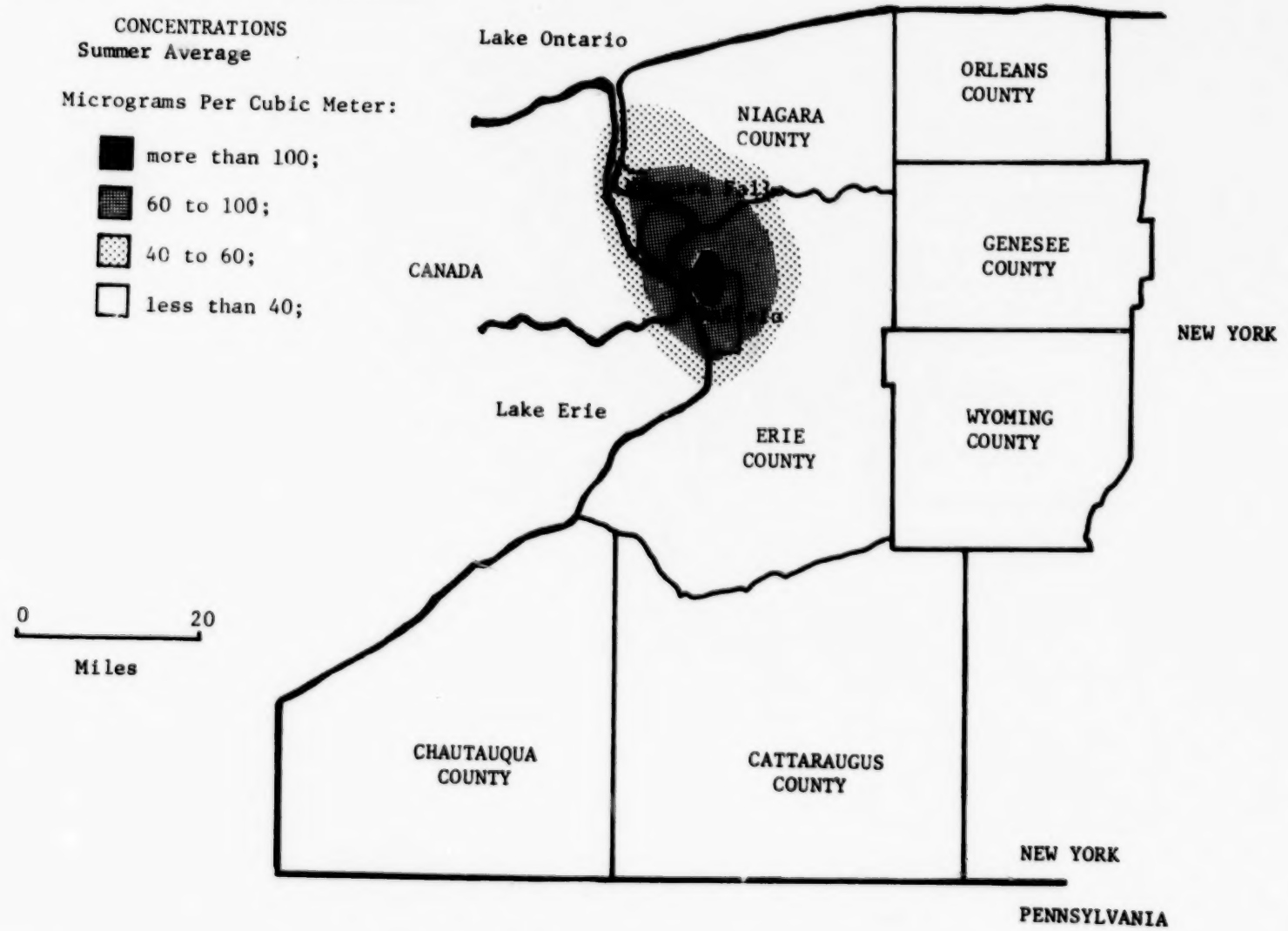
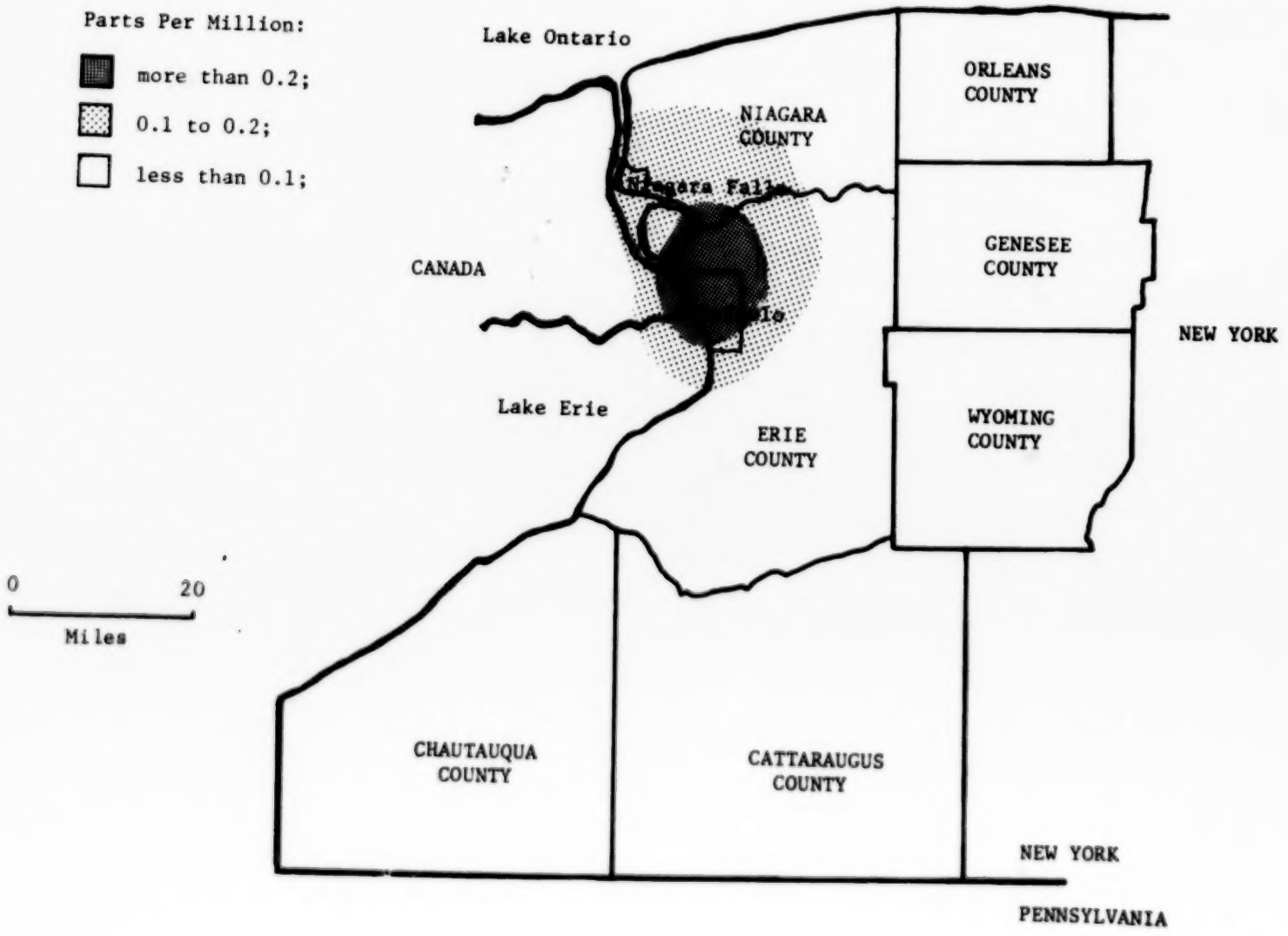


Figure 15:

THEORETICAL CARBON MONOXIDE CONCENTRATIONS
Summer Average



Counties and Canada are subjected to levels which are above those in surrounding rural areas.

SUMMARY

The emissions inventory and the air quality information are important indicators of how large a region must be in order to contain all of the major technical elements of the air pollution problem. From the above analysis, it appears that Erie and Niagara Counties should be included in the Buffalo Region, while surrounding counties in the United States should be excluded since they are not closely linked to the Buffalo air pollution problem. Since the scope of this report included only areas under the jurisdiction of the United States, and since the emissions inventory did not contain pollution sources in Canada, this analysis has not attempted to evaluate the extent of pollution crossing the international boundary.

THE PROPOSED REGION

PROPOSAL

Subject to the scheduled consultation, the Secretary, Department of Health, Education, and Welfare, proposes to designate an air quality control region for the Buffalo area, consisting of the area encompassed by the following jurisdictions:

In the State of New York:

Erie County

Niagara County

The boundaries of the proposed Region are illustrated in Figure 16. Figure 17 locates the Region in relation to the rest of New York and surrounding states.

DISCUSSION OF PROPOSAL

To be successful, an air quality control region should meet three basic objectives, as discussed in the section entitled "The Size of a Region", page 6. First, a region should be self-contained, with respect to air pollution sources and receptors. Second, a region should be designed to meet not only present conditions but also future conditions. Third, region boundaries should foster unified and cooperative governmental administration of the air resource throughout the region. The proposed boundaries of the Buffalo Air Quality Control Region satisfy these three objectives.

The first objective, that a region be self-contained with respect to

Figure 16:

PROPOSED BUFFALO

AIR QUALITY CONTROL REGION:

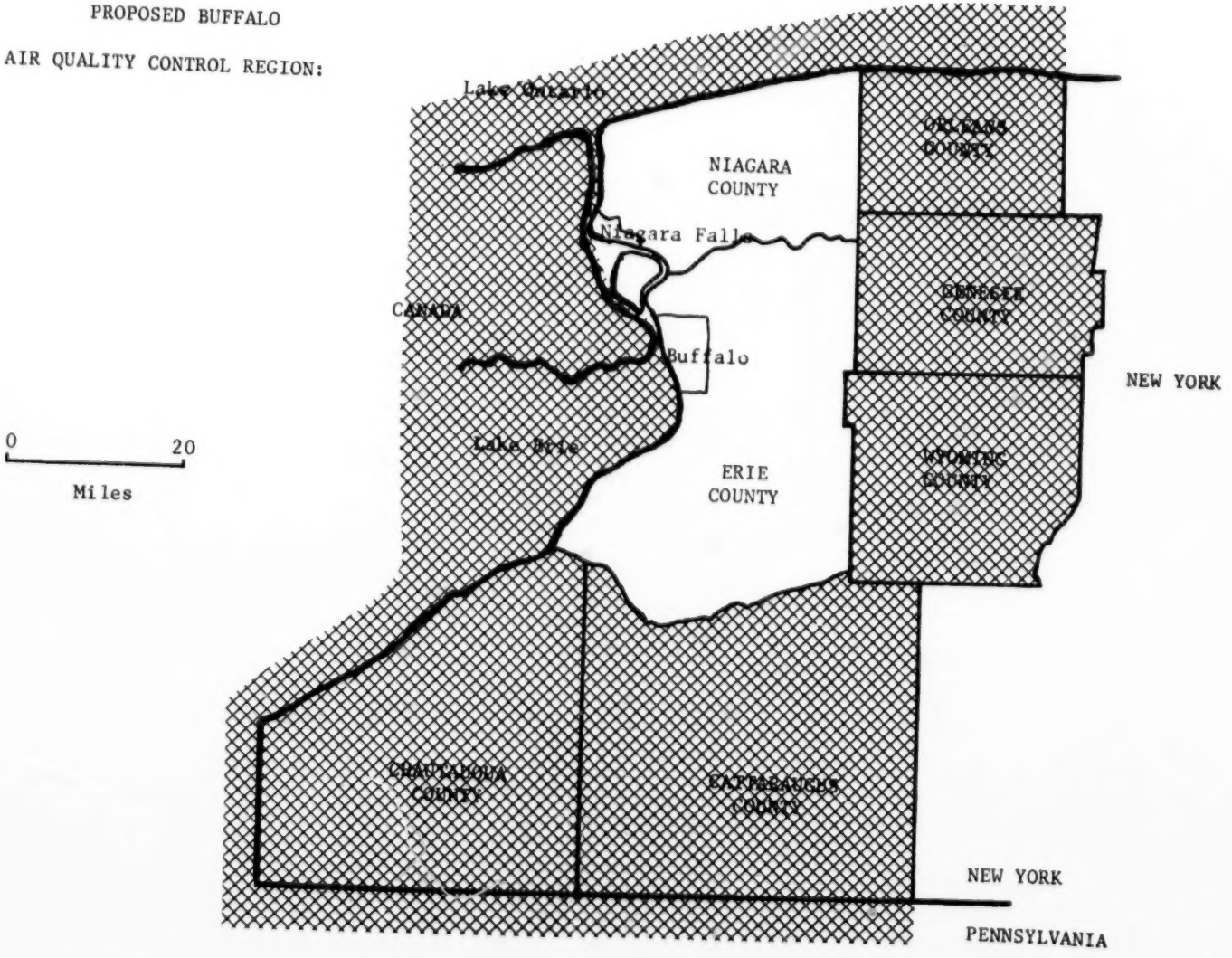
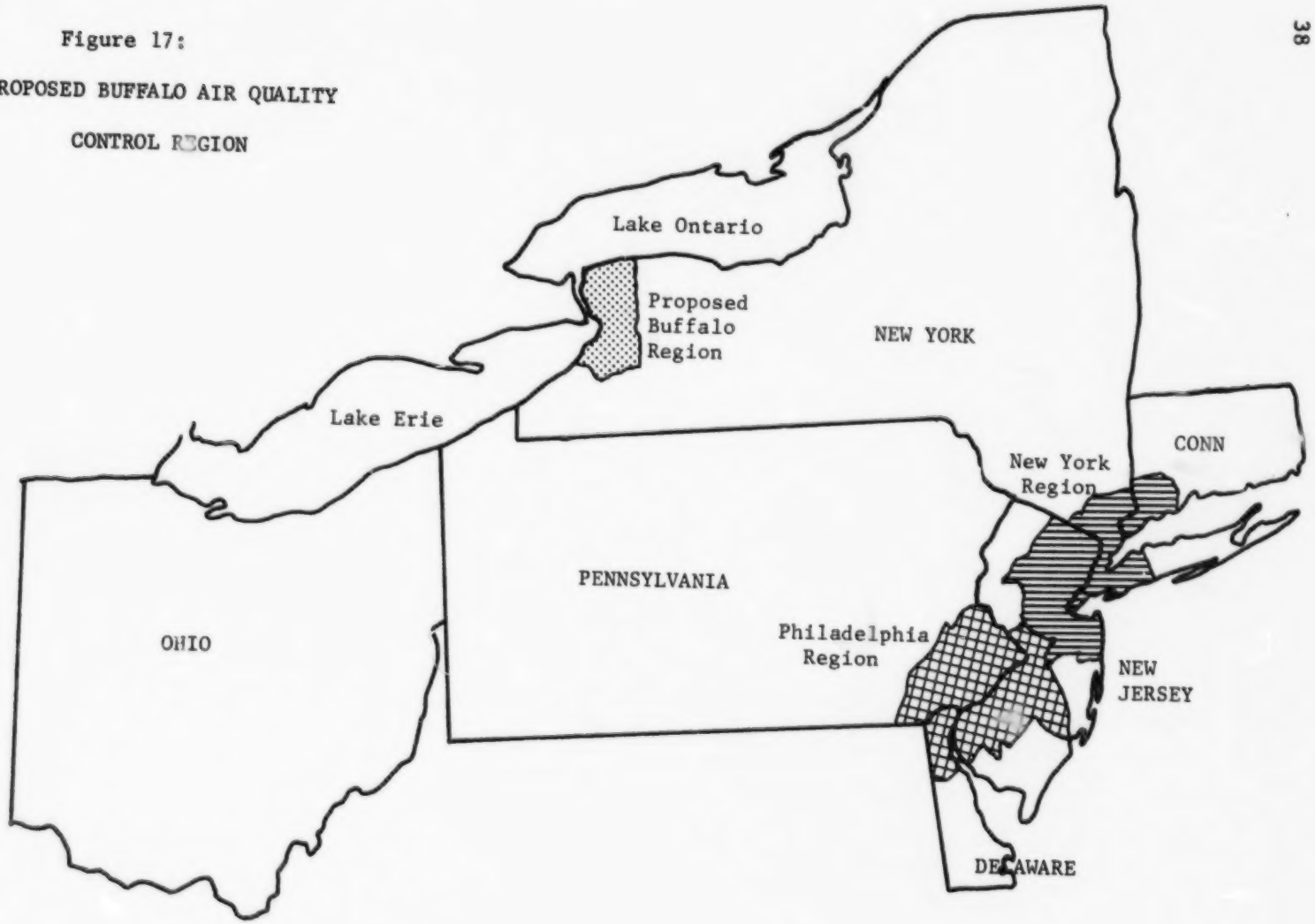


Figure 17:

PROPOSED BUFFALO AIR QUALITY

CONTROL REGION



pollution sources and receptors, appears to be satisfied by the two-county proposal. The two-county Region contains all of the major sources in the area, except for those in Canada. Furthermore, ambient air pollution appears to extend no further than the boundaries of Erie and Niagara Counties, except for parts of Canada. Thus, to the extent of the jurisdiction of the United States, the air pollution problem of the proposed region seems to be self-contained.

The second objective, that a region be designed for likely future growth as well as present conditions, appears to be satisfied by the two-county proposal also. There is a sufficient amount of rural land surrounding Buffalo and Niagara Falls (N.Y.) to absorb expected population growth for at least a decade. Urbanization spreading out from Buffalo and Niagara Falls is not likely to extend into the surrounding Counties of Orleans, Genesee, Wyoming, Cattaraugus, or Chautauqua for several years. Thus, it is unlikely that these counties will become closely linked to the Buffalo air pollution problem in the near future.

The third objective, that a region should be compatible with unified and cooperative governmental administration of an air pollution control program, is also satisfied by the two-county proposal. Erie and Niagara Counties presently conduct the only two important county air pollution programs in the area. Erie and Niagara Counties have been linked through the planning functions of the Regional Planning Board. Erie and Niagara Counties form a natural economic and cultural unit.

Since the two-county area seems to satisfy the three major objectives of air quality control region boundaries, it forms the proposal for a

Buffalo Air Quality Control Region made in this report.

This proposal represents a starting point for discussion in the consultation with appropriate State and local officials, which will be held before the Buffalo Region is finally designated.

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